

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In Re:)	
)	
COMMERCIAL SERVICES GROUP, INC.,)	Case No. 05-12322-SSM
)	Chapter 11
Debtor.)	

RESPONSE FOR MOTION FOR TURNOVER

COMES NOW Commercial Services Group, Inc, by counsel, and in response to the Motion for Turnover states that:

1. At the time of the 341 meeting, Debtor had in his possession a 1997 GMC 3500.
2. At the 341 meeting, Debtor's principal agreed to acquire the asset from the Trustee. He believed the vehicle was worth \$1500.
3. Subsequent to the 341 meeting, the Debtor attempted to drive the vehicle. At the time of driving the vehicle, the transmission failed. The Debtor had it take to the Advance Auto Care shop in Manassas, Virginia, where it is currently stored.
4. The labor to repair is \$800. The part is \$2600.
5. Debtor is prepared to cause it to be turned over but believes that it would be burdensome to the estate.

WHEREFORE Debtor prays that this court enter an appropriate order in this matter.

COMMERCIAL SERVICES GROUP, INC
By Counsel

/s/ Richard J. Stahl
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CERTIFICATE OF SERVICE

I hereby certify that I mailed a true copy of the foregoing this 4th day of September, 2010 to Richard A. Bartl, Trustee, Tyler, Bartl, Gorman, and Ramsdell, PLC, Tyler, Bartl, Ramsdell & Counts, P.L.C., 300 N. Washington Street, Suite 202, Alexandria, VA 22314 and to all creditors and parties in interest on the attached matrix.

/s/ Richard J. Stahl

Richard J. Stahl